

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Katrina M. Lewis

Debtor(s)

Case No.: 19-14535-AMC

Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Katrina M. Lewis, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about July 18, 2019.
2. The Chapter 13 filing was assigned case number 19-14535-AMC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about January 22, 2020.
4. Debtor was involved in two separate automobile accidents wherein two separate vehicles, Toyota Rav4 and Mitsubishi Outlander, were totaled.
5. Debtor has no personal injury claims arising from either accident.
6. Debtor wishes to modify her plan to surrender both vehicles.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: January 24, 2020

/s/Brad J. Sadek, Esq.
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